

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA (READING)**

IN RE:  MARK A GOODMAN CARRIE L GOODMAN  Debtors	Case No. 19-14192-pmm
FREEDOM MORTGAGE CORPORATION  Movant	Chapter 13
vs.  MARK A GOODMAN CARRIE L GOODMAN  Respondents	11 U.S.C. §362

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE**

Freedom Mortgage Corporation has filed a Motion for Relief from the Automatic Stay with the Court to permit FREEDOM MORTGAGE CORPORATION to Foreclose on 55 FURNACE ROAD, WERNERSVILLE, PA 19565 .

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)**

1. If you do not want the Court to grant relief sought in the motion or if you want the Court to consider your views on the motion, then on or before March 9, 2021 you or your attorney must do all of the following:

(a) file an answer explaining your position at:

Clerk's Office, U.S. Bankruptcy Court  
The Gateway Building  
201 Penn Street, Suite 103  
Reading, PA 19601

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's attorney:

Brock and Scott, PLLC  
8757 Red Oak Boulevard, Suite 150  
Charlotte, NC 28217

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an Order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Patricia M. Mayer on March 16, 2021 at 10:00 am in Courtroom 4<sup>th</sup> Floor, United States Bankruptcy Court, The Gateway Building, 201 Penn Street, Reading, PA 19601. Unless the Court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P 9014(d).

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorneys named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

February 23, 2021